

EXHIBIT B

Page 1

1 UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF NEW JERSEY
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5 MDL No. 16-2738 (FLW) (LHG)

6 IN RE: JOHNSON & JOHNSON
7 TALCUM POWDER PRODUCTS
8 MARKETING, SALES PRACTICES,
9 AND PRODUCTS LIABILITY LITIGATION
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14 The remote video deposition of WILLIAM LONGO,
15 Ph.D., taken via Zoom videoconference on
16 May 2, 2024, commencing at approximately
17 11:20 a.m., before Lois Anne Robinson,
18 Certified Realtime Reporter.
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<div>1I N D E X</div> <div>2EXAMINATIONPAGE</div> <div>3By Mr. Ewald6</div> <div>4</div> <div>5*****</div> <div>6EXHIBITSPAGE</div> <div>7Exhibit 117</div> <div>8Lizardite Standard</div> <div>9Exhibit 217</div> <div>10Antigorite Standard</div> <div>11Exhibit 331</div> <div>12Shu-Chun Su - "The Dispersion Staining Technique and Its</div> <div>13Application to Measuring Refractive Indices of Non-Opaque</div> <div>14Materials, with Emphasis on Asbestos Analysis"</div> <div>15Exhibit 431</div> <div>16Shu-Chun Su - "Rapidly and Accurately Determining Refractive</div> <div>17Indices of Asbestos Fibers by Using Dispersion Staining</div> <div>18Method"</div> <div>19Exhibit 542</div> <div>20Notice of Deposition</div> <div>21Exhibit 643</div> <div>22PSC Objections to Updated Notice of Deposition</div> <div>23Exhibit 756</div> <div>24Curriculum vitae</div>	<div>1VIDEOGRAPHER:</div> <div>2We are now on the record.</div> <div>3My name is Maria Lima. I'm a</div> <div>4videographer for Golkow.</div> <div>5Today's date is May 2nd, 2024, and the</div> <div>6time is 11:20 a.m. This remote video deposition</div> <div>7is being held in the matter of Talcum Powder</div> <div>8Litigation.</div> <div>9The deponent is William E. Longo, Ph.D.</div> <div>10All parties to this deposition are</div> <div>11appearing remotely and have agreed to the witness</div> <div>12being sworn in remotely. Due to the nature of</div> <div>13remote reporting, please pause briefly before</div> <div>14speaking to ensure all parties are heard</div> <div>15completely.</div> <div>16Counsel's appearances will be noted on</div> <div>17the stenographic record.</div> <div>18The court reporter will now swear in</div> <div>19the witness.</div> <div>20</div> <div>21WILLIAM LONGO, Ph.D.,</div> <div>22the witness, after having first been</div> <div>23duly sworn to tell the truth, the whole truth,</div> <div>24and nothing but the truth, was examined and</div>

<p style="text-align: right;">Page 6</p> <p>1 testified as follows:</p> <p>2 EXAMINATION</p> <p>3 BY MR. EWALD:</p> <p>4 Q Good morning, Dr. Longo.</p> <p>5 A Good morning.</p> <p>6 Q It's been a while.</p> <p>7 A It has been a while.</p> <p>8 Q Okay. So let's get some of the</p> <p>9 logistics out of the way first.</p> <p>10 Well, first question is where are you</p> <p>11 today?</p> <p>12 A I am in -- I'm at the -- I'm at</p> <p>13 Materials Analytical Services, LLC, and I'm</p> <p>14 sitting in the second -- the small conference</p> <p>15 room.</p> <p>16 Q And is there anyone in the room with</p> <p>17 you?</p> <p>18 A Yes.</p> <p>19 Q Who?</p> <p>20 A Leigh O'Dell.</p> <p>21 Q Anybody else?</p> <p>22 A No.</p> <p>23 Q What --</p> <p>24 At least on the screen I see a number</p>	<p style="text-align: right;">Page 8</p> <p>1 analysis of fibrous -- fibrous talc and other</p> <p>2 information, William E. Longo, Ph.D., CEO, MAS,</p> <p>3 LLC, September 2nd, 2022.</p> <p>4 I'm fairly certain that this has</p> <p>5 been -- this has been provided in the past. And</p> <p>6 what we have here is, on table 2, is the RG-144</p> <p>7 Calidria spiked Johnson baby powder -- Johnson</p> <p>8 talcum powder samples where we did PLM analysis</p> <p>9 on the RG-144 spiked starting at table 2,</p> <p>10 .1 percent all the way down to .0001 percent.</p> <p>11 There's a typo there.</p> <p>12 Q Sorry. So the record's clear, what's</p> <p>13 the typo?</p> <p>14 A CSM, we also did a standard spike from</p> <p>15 .1 percent to .0001 percent, which that should be</p> <p>16 for the ISO. So this was our standardization on</p> <p>17 the number of structures of the Calidria going</p> <p>18 all the way down, and then we have some other</p> <p>19 information there that we've also provided.</p> <p>20 I have --</p> <p>21 Q Sorry, Doctor. Before we leave that</p> <p>22 one, I just want to make sure I understand the</p> <p>23 typo that you referred to on table 2, page 4, of</p> <p>24 this report. There's an extra zero on M65947?</p>
<p style="text-align: right;">Page 7</p> <p>1 of different stacks of paper. Can you generally</p> <p>2 describe for me what you have in front of you so</p> <p>3 I know what you have?</p> <p>4 A Well, I have the supplement expert</p> <p>5 report, MDL Johnson's Baby Powder, et cetera,</p> <p>6 et cetera, May 2nd, 2024, which just, on page --</p> <p>7 page -- on page 5, an overview, this supplement</p> <p>8 report was done to correct typographical errors</p> <p>9 involving the container calculations. And then I</p> <p>10 point out where those corrections were made and</p> <p>11 what was made. They're very minor, but there</p> <p>12 were some typos there on the number of</p> <p>13 containers. And that's the only thing I changed.</p> <p>14 Q Okay.</p> <p>15 MS. O'DELL:</p> <p>16 And, John, I will put that in the chat</p> <p>17 so you'll have it.</p> <p>18 MR. EWALD:</p> <p>19 Yeah. That'll be -- I was worried I</p> <p>20 was missing it. So, yes, that would be great to</p> <p>21 put it in the chat. Thank you.</p> <p>22 A I also have a report, PLM analysis,</p> <p>23 chrysotile RIs and structure size for MAS's</p> <p>24 RG-144 and SG-210 chrysotile standard in the</p>	<p style="text-align: right;">Page 9</p> <p>1 A It should be 0.001 percent, like the</p> <p>2 exact same number down there for the CSM.</p> <p>3 Q Okay.</p> <p>4 A That's one too many zeros there.</p> <p>5 Q Right.</p> <p>6 A And it's interesting. I always find</p> <p>7 that in the deposition when I'm explaining what</p> <p>8 we have.</p> <p>9 This was a -- we sent these in. I was</p> <p>10 just able to locate them, the request in the --</p> <p>11 it's the photographs for the lizard- --</p> <p>12 lizardite, which -- in 1.550, and the antigorite</p> <p>13 in 1.550 showing the difference that you get for</p> <p>14 chrysotile for that. That's a response to the...</p> <p>15 I also, starting over here, I have</p> <p>16 volume 69, second quarter, 2022, the published --</p> <p>17 the published paper for Dr. Shu-Chun Su in the</p> <p>18 journal called The Microscope, volume 69,</p> <p>19 hyphen -- I mean 69-2, pages 51 through 69, 2022,</p> <p>20 entitled "The Dispersion Staining Technique and</p> <p>21 Its Application to Measuring Refractive Indices</p> <p>22 of Non-opaque Materials, with Emphasis --</p> <p>23 Emphasis on Asbestos Analysis."</p> <p>24 And he gave a -- he had some</p>

<p style="text-align: right;">Page 178</p> <p>1 They look at reports that you've generated where 2 you've either not found something or found 3 something. They want to look at the process 4 blanks that we say that we do on every batch of 5 TEM samples. They want to see, you know, how 6 we're determining and not contaminating samples. 7 You know, every quarter we do air samples in all 8 the areas where we handle asbestos; whether it's 9 working properly, whether they have the 10 appropriate airflow into them. You know, it's 11 just whatever -- 12 It's really not a set schedule of what 13 they're looking at. Do we calibrate the 14 balances? Did we do this? Did we do that? 15 Fortunately, I don't have to deal with them too 16 much. 17 Q So you said they look at reports. That 18 includes litigation reports? 19 A Excuse me? 20 Q So they look at reports. Does that 21 include litigation reports? 22 A Um, well, we show them the analysis of 23 a litigation report, not the -- they don't read 24 the reports. I would never do that. But we've</p>	<p style="text-align: right;">Page 180</p> <p>1 Object to the form. 2 A I'm preventing you or your client to 3 get double the confidential business records that 4 people would love to have because it would save 5 them a lot of time and effort to get these 6 certifications. 7 You know, it's the same thing with 8 NVLAP. I wouldn't give those up either until you 9 guys did a -- J&J did a FOIA on it. And I wasn't 10 going to provide any information about our audit 11 with FDA. So, you know, I look at that as all 12 confidential business records. 13 MR. EWALD: 14 Q From -- 15 For all of the -- for all of the PLM 16 chrysotile tests that are included in the fourth 17 supplemental MDL report dated April 29th, 2024, 18 how much money has MAS been paid by plaintiffs' 19 lawyers? 20 A From when to when? 21 Q For all of the testing of the M- -- 22 Withdrawn. 23 From when to when is all of the tests 24 included in the fourth supplemental MDL report</p>
<p style="text-align: right;">Page 179</p> <p>1 got to show them examples of the analysis we're 2 doing. 3 But most everything else is not -- you 4 know, everything else besides what we're doing 5 for the Blount -- the Blount and the TEM, it's 6 nonlitigation that we have these other 7 certifications for. 8 Q Have you or anyone at MAS, to your 9 knowledge, asked A2LA about what it would take to 10 get certified for the PLM chrysotile method? 11 A No. Not that I'm aware. 12 Q In -- 13 Since MAS has obtained these A2LA 14 talc-related certifications, you have testified 15 on direct at various trials highlighting the 16 accreditations; correct? 17 A Absolutely. We're proud of it. And I 18 think we're the only ones in the country still 19 that has that certification on both plaintiff's 20 and defense side. 21 Q But yet you are preventing me and my 22 client from finding out anything that went into 23 obtaining those certifications. 24 MS. O'DELL:</p>	<p style="text-align: right;">Page 181</p> <p>1 dated April 29th, 2024, that are the PLM 2 chrysotile tests? 3 A I would consider that confidential. 4 Q On what basis? 5 A The basis is is that our -- we look at 6 it as confidential unless we can come to an 7 agreement, like the last time, that these 8 invoices were produced from both sides, you know, 9 your experts, our experts, and we can redact what 10 we did. 11 And I recall that the amount MAS 12 invoices for -- I think this is 2016, 2017, 2018 13 or so -- it's like 2.9 million, and RJ Lee was 14 like 5-point-something million, 5.6 million. 15 But, you know, I thought that was 16 pretty fair, that, okay, get the experts in. We 17 have to produce, you know, who we'd done the work 18 for, and we were able to redact. So this was, 19 you know, quid pro quo. It seems like only -- 20 So I always consider that confidential. 21 Q Unless there's a quid pro quo. 22 A No. I still think it ought to be 23 confidential. But certainly, you know, when the 24 judges get together and they come up with</p>

<p style="text-align: right;">Page 182</p> <p>1 something that they deem is fair for both sides.</p> <p>2 Q So it's, in your nonlegal opinion, it</p> <p>3 should be confidential about the amount of money</p> <p>4 you have been paid by plaintiffs' lawyers to</p> <p>5 conduct the studies that you are relying on in</p> <p>6 your fourth supplemental MDL report for your</p> <p>7 expert opinions in this case?</p> <p>8 MS. O'DELL:</p> <p>9 Object to the form.</p> <p>10 A I'm not an attorney.</p> <p>11 MS. O'DELL:</p> <p>12 Yeah. Please don't give a legal</p> <p>13 opinion.</p> <p>14 MR. EWALD:</p> <p>15 Q I was very clear. I asked not from a</p> <p>16 legal perspective.</p> <p>17 MS. O'DELL:</p> <p>18 Well --</p> <p>19 MR. EWALD:</p> <p>20 Hold on. Hold on. You're the one --</p> <p>21 Leigh, hold on. Hold on.</p> <p>22 MS. O'DELL:</p> <p>23 I'm not --</p> <p>24 MR. EWALD:</p>	<p style="text-align: right;">Page 184</p> <p>1 studies that are contained in Dr. Longo's fourth</p> <p>2 supplemental MDL report dated April 29th, 2024,</p> <p>3 and specifically outlined on tables 1, 2, 3, 4,</p> <p>4 5, 6, and 7 at the back of the report?</p> <p>5 MS. O'DELL:</p> <p>6 Same objection.</p> <p>7 MR. EWALD:</p> <p>8 Q But you understand what I'm asking for?</p> <p>9 A I understand. And I would just be</p> <p>10 speculating. I have no idea on what the amounts</p> <p>11 would be for all -- for the different plaintiffs</p> <p>12 that we've done work for. I'm just -- you know,</p> <p>13 on the chrysotile.</p> <p>14 Q Okay. I'm about to start something</p> <p>15 new. We can stop ten minutes early if you want.</p> <p>16 MS. O'DELL:</p> <p>17 Okay. Let's do it. Let's, you know,</p> <p>18 let's go off the record and stop for the day, and</p> <p>19 then we'll pick it up.</p> <p>20 VIDEOGRAPHER:</p> <p>21 Okay. Should we go off record?</p> <p>22 MR. EWALD:</p> <p>23 Yes.</p> <p>24 MS. O'DELL:</p>
<p style="text-align: right;">Page 183</p> <p>1 There's not a question pending.</p> <p>2 Leigh -- Leigh --</p> <p>3 MS. O'DELL:</p> <p>4 You do not have a question pending.</p> <p>5 I'm objecting and saying he's provided that</p> <p>6 there's been information provided about what he's</p> <p>7 paid -- been paid in relation to his MDL work. I</p> <p>8 just want to make that clear. And we provided</p> <p>9 those invoices, and he testified to it earlier.</p> <p>10 So to the degree you're asking</p> <p>11 something else, you need to make it clear. And I</p> <p>12 just want to make sure the record is -- is clear</p> <p>13 as well that we've provided what we feel is</p> <p>14 appropriate under the MDL order.</p> <p>15 MR. EWALD:</p> <p>16 And I'm happy -- I don't always ask the</p> <p>17 best questions, but I feel like my question was</p> <p>18 pretty clear, which is how much money has Dr. --</p> <p>19 Sorry. Withdrawn.</p> <p>20 How much money has AMA --</p> <p>21 See, now you've got me all flustered,</p> <p>22 Leigh.</p> <p>23 How much money has MAS been paid by</p> <p>24 plaintiffs' lawyers for the PLM chrysotile</p>	<p style="text-align: right;">Page 185</p> <p>1 Thank you, John.</p> <p>2 VIDEOGRAPHER:</p> <p>3 Going off record. Time is 4:48.</p> <p>4 (Deposition adjourned at 4:48 p.m.)</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>